

MATTHEW R. REED, State Bar No. 196305
 CAROLINE E. WILSON, State Bar No. 241031
 JENNIFER M. MARTINEZ, State Bar No. 262081
 MICHAEL D. K. NGUYEN, State Bar No. 264813
 TRACY D. RUBIN, State Bar No. 267420
 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 650 Page Mill Road
 Palo Alto, CA 94304-1050
 Telephone: (650) 493-9300
 Facsimile: (650) 493-6811
 Email: mreed@wsgr.com

CINDY LIOU, State Bar No. 252161
 ASIAN PACIFIC ISLANDER LEGAL OUTREACH
 1121 Mission Street
 San Francisco, California 94103
 Telephone: (415) 567-6255
 Facsimile: (415) 567-6248
 Email: cliou@apilegaloutreach.org

Attorneys for Plaintiff
 JANE DOE

MIA S. BLACKLER, State Bar. No. 188112
 BUCHALTER NEMER
 A Professional Corporation
 333 Market Street, 25th Floor
 San Francisco, CA 94105-2126
 Telephone: (415) 227-0900
 Facsimile: (415) 227-0770
 Email: mblackler@buchalter.com

Attorneys for Defendants
 GIUSEPPE PENZATO and KESIA PENZATO

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

23	JANE DOE,)	CASE NO.: 3:10-CV-05154-MEJ
)	
24	Plaintiff,)	STIPULATION FOR DEFENDANTS
)	TO AMEND THEIR ANSWER AND
25	v.)	STIPULATED REQUEST AND
)	[PROPOSED] ORDER TO
26	GIUSEPPE PENZATO, an individual; and)	ENLARGE TIME FOR PLAINTIFF
	KESIA PENZATO, an individual,)	JANE DOE TO RESPOND TO
27)	DEFENDANTS' ANSWER
28	Defendants.)	

STIPULATION FOR DEFENDANTS TO AMEND THEIR
 ANSWER AND STIPULATED REQUEST AND
 [PROPOSED] ORDER TO ENLARGE TIME FOR
 PLAINTIFF TO RESPOND

3:10-CV-05154-MEJ

Pursuant to Civil Local Rules 6-1(b) and 6-2, and Federal Rule of Civil Procedure 15(a)(2), Plaintiff Jane Doe¹ (“Plaintiff”) and Defendants Giuseppe Penzato and Kesia Penzato (“Defendants”), by and through their respective counsel of record, hereby stipulate that Defendants may amend their Answer and hereby submit this stipulated request to enlarge time for Plaintiff to file certain motions responsive to Defendants’ Answer:

WHEREAS Plaintiff filed her Complaint on November 12, 2010;

WHEREAS the parties previously stipulated that Defendants would have until March 29, 2011 to answer or respond to Plaintiff’s Complaint;

WHEREAS Defendants filed and served their Answer on March 29, 2011;

WHEREAS the parties previously stipulated and this Court ordered that Plaintiff would have until April 29, 2011 to file any motions responsive to Defendants’ Answer previously due on April 22, 2011;

WHEREAS the parties have agreed that Defendants shall amend Defendants’ Answer as to certain affirmative defenses;

WHEREAS allowing an opportunity for Defendants to amend their Answer would promote judicial efficiency;

WHEREAS allowing an additional week and a half for Plaintiff to file certain motions responsive to Defendants’ Answer will not alter the date of any event or deadline already fixed by this Court;

NOW, THEREFORE, the undersigned parties, through their respective counsel, hereby stipulate and agree as follows:

1. Defendants shall file and serve an amended Answer to the Complaint by no later than May 6, 2011; and

¹ The parties acknowledge that Defendants’ agreement to Plaintiff’s use of “Jane Doe” in this filing in no way constitutes Defendants’ consent to Plaintiff proceeding under a pseudonym in this litigation, nor have Defendants waived any argument that they may have to oppose Plaintiff’s Motion for a Protective Order.

2. If Defendants fail to file and serve their amended Answer by May 6, 2011, Plaintiff shall have until May 10, 2011 to file any motions responsive to Defendants' Answer previously due on April 29, 2011.

Dated: April 29, 2011

WILSON SONSINI GOODRICH & ROSATI
A Professional Corporation

By: s/ Matthew R. Reed
Matthew R. Reed

Attorneys for Plaintiff
JANE DOE

BUCHALTER NEMER
A Professional Corporation

By: s/ Mia S. Blackler
Mia S. Blackler

Attorneys for Defendants
GUISEPPE PENZATO and KESIA
PENZATO

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 2, 2011


The Honorable Maria-Elena James
United States Magistrate Judge

DECLARATION OF CONSENT

Pursuant to General Order 45, the undersigned certifies that concurrence in the filing of this document was obtained from each of the other signatories.

Dated: April 29, 2011

By: s/ Caroline Wilson
Caroline Wilson